

EXHIBIT 62

West Publishing Corporation vs.
Legalease Solutions, LLC

Videotaped
Deposition

Tomas Van Der Heijden, Volume I
01/28/2020

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4 UNITED STATES DISTRICT COURT
5 DISTRICT OF MINNESOTA
6 Court File No. 18-CV-01445 (DSD/ECW)
7 - - - - -

8 WEST PUBLISHING CORPORATION,
9 Plaintiff/Counterclaim-
10 Defendant,

11 v.

12 LEGALEASE SOLUTIONS, LLC,
13 Defendant/Counterclaim-Plaintiff.
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Taken January 28, 2020 By Kelly A. Herrick

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Also present: Kraig Hildahl, Videographer

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Jeanpierre Guiliano

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1 THE DEPOSITION OF TOMAS VAN DER HEIJDEN is
2 taken on this 29th day of January, 2020, at
3 Fredrikson & Byron, 200 South Sixth Street,
4 Suite 4000, Minneapolis, Minnesota,
09:35AM 5 commencing at 9:38 a.m.

09:35AM 6 (Exhibits 90-91 were marked.)

09:38AM 7 THE VIDEOGRAPHER: We are on the
09:38AM 8 record. Today's date is January 28, 2020.
09:38AM 9 The time is 9:38 a.m.

09:38AM 10 This is the videotaped deposition
09:38AM 11 of 30(b)(6) designee Tomas van der Heijden
09:38AM 12 taken in the matter of West Publishing
09:38AM 13 Corporation versus LegalEase Solutions, LLC,
09:38AM 14 Case Number 18-CV-01445 (DSD/ECW), filed in
09:39AM 15 the US District Court, District of
09:39AM 16 Minnesota.

09:39AM 17 The court reporter today is Kelly
09:39AM 18 Herrick. My name is Kraig Hildahl, the
09:39AM 19 legal videographer. We are both with Doris
09:39AM 20 Wong & Associates.

09:39AM 21 Will counsel please identify
09:39AM 22 themselves for the record.

09:39AM 23 MS. JOHNSON: Good morning. This
09:39AM 24 is Katharine Johnson on behalf of the

09:39AM 1 deponent.

09:39AM 2 MR. LASHWAY: Scott Lashway on
09:39AM 3 behalf of the Defendants -- I'm sorry, the
09:39AM 4 Plaintiff, West Publishing Corporation.

09:39AM 5 MS. CEFALU: Amanda Cefalu on
09:39AM 6 behalf of LegalEase Solutions, LLC.

09:39AM 7 MR. LASHWAY: And I -- I'm sorry,
09:39AM 8 ma'am, but I have with me Mara O'Malley,
09:39AM 9 M-A-R-A, and in-house counsel for West,
09:40AM 10 JP Giuliano, who is in the law department at
09:40AM 11 West.

09:40AM 12 THE VIDEOGRAPHER: Will the court
09:40AM 13 reporter please swear in the witness and
09:40AM 14 then we can proceed.

09:40AM 15 TOMAS VAN DER HEIJDEN,
09:40AM 16 A witness in the above-entitled action,
09:40AM 17 after having been first duly sworn,
09:40AM 18 testifies and says as follows:

09:40AM 19 EXAMINATION

09:40AM 20 BY MR. LASHWAY:

09:40AM 21 Q. Mr. van der Heijden, I'm counsel for West.

09:40AM 22 We've met once before at a Motion to Compel
09:40AM 23 hearing in St. Paul District Court --

09:40AM 24 A. Yep.

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Legalease Solutions, LLC

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11:03AM 1 A. I believe that was created by ROSS.

11:03AM 2 Q. And you see 1(d) refers to the ROSS
11:03AM 3 Classifier project?

11:03AM 4 A. I do.

11:03AM 5 Q. What does that refer to?

11:03AM 6 A. That refers to a project whereby we wanted
11:03AM 7 to classify our database of case law into
11:03AM 8 distinct and separate practice areas.

11:03AM 9 Q. Can you give me an example of a practice
11:03AM 10 area.

11:03AM 11 A. Intellectual property.

11:03AM 12 Q. So, it was just -- was it just very high
11:03AM 13 level?

11:03AM 14 A. It was about 40 practice areas, I believe.

11:03AM 15 Q. And who identified those practice areas?

11:04AM 16 A. I did.

11:04AM 17 Q. And how did you do that?

11:04AM 18 A. I analyzed how practice areas are generally
11:04AM 19 defined within the US legal market.

11:04AM 20 Q. Did you use the Internet?

11:04AM 21 A. Yes.

11:04AM 22 Q. Did you use any material on Westlaw's
11:04AM 23 Website?

11:04AM 24 A. I might have. I can't recall.

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1 STATE OF MINNESOTA
2
3 COUNTY OF WASHINGTON

CERTIFICATE

4 I, Kelly A. Herrick, hereby
5 certify that I reported the deposition of
6 TOMAS VAN DER HEIJDEN on the 28th day of
7 January, 2020 in Minneapolis, Minnesota, and
8 that the witness was by me first duly sworn
9 to tell the truth and nothing but the truth
10 concerning the matter in controversy
11 aforesaid;

12 That I was then and there a notary
13 public in and for the County of Washington,
14 State of Minnesota; that by virtue thereof I
15 was duly authorized to administer an oath;

16 That the foregoing transcript is a
17 true and correct transcript of my
18 stenographic notes in said matter,
19 transcribed under my direction and control;

20 That the cost of the original has
21 been charged to the party who noticed the
22 deposition and that all parties who ordered
23 copies have been charged at the same rate
24 for such copies;

That the reading and signing of
the deposition was not waived;

That I am not related to any of
the parties hereto, nor interested in the
outcome of the action and have no contract
with any parties, attorneys or persons with
an interest in the action that has a
substantial tendency to affect my
impartiality;

WITNESS MY HAND AND SEAL this 30th
day of January, 2020.

Kelly A. Herrick
Notary Public